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Los Angeles, California 90067-3086

STROOCK & STROOCK & LAVAN LLP

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| Plaintiff Luis Alandy ("Plaintiff") and Defendant Chase Bank USA, N.A., erroneously sued        |  |  |  |  |
|---|--|--|--|--|
| s JPMorgan Chase Bank ("Chase"), through their undersigned counsel, hereby stipulate as         |  |  |  |  |
| follows:  |  |  |  |  |
| WHEREAS, Plaintiff filed the Complaint in this action on April 21, 2016 (Dkt. No.1);            |  |  |  |  |
| WHEREAS, the current deadline for Chase to respond to the Complaint is June 14, 2016;           |  |  |  |  |
| WHEREAS, pursuant to Local Rule 6-1 the parties may stipulate in writing, without a             |  |  |  |  |
| Court order, to extend the time within which to answer or otherwise respond to the Complaint,   |  |  |  |  |
| provided the change will not alter the date of any event or any deadline already fixed by Court |  |  |  |  |
| order:  |  |  |  |  |

WHEREAS, the parties agree to further continue the deadline for Chase to file and serve a response to the Complaint by two (2) weeks, to and including June 28, 2016, to allow Chase additional time to investigate the allegations in the Complaint;

WHEREAS, an additional two-week extension of time for Chase to respond to the Complaint will not alter the date of any event or any deadline already fixed by Court order;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between Plaintiff, by Plaintiff's undersigned counsel, and Chase, by its undersigned counsel, that the deadline for Chase to respond to the Complaint shall be further continued from June 14, 2016 to June 28, 2016.

Dated: June 14, 2016 STROOCK & STROOCK & LAVAN LLP JULIA B. STRICKLAND STEPHEN J. NEWMAN JULIETA STEPANYAN

> By: /s/ Julieta Stepanyan Julieta Stepanyan

Attorneys for Defendant CHASE BANK USA, N.A., erroneously sued as JPMorgan Chase Bank

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|  | 1   | Dated: June 14, 2016 | SAGARIA LAW- A PROFESSIONAL<br>CORPORATION  |
|--|-----|----------------------|---|
|  | 2   |                      |   |
|  | 3   |                      | By: /s/ Elliot Gale   |
|  | 4   |                      | By: /s/ Elliot Gale Elliot W. Gale  |
|  | 5   |                      | ELLIOT W. GALE<br>Egale@sagarialaw.com  |
|  | 6   |                      | Egale@sagarialaw.com<br>SAGARIA LAW- A PROFESSIONAL<br>CORPORATION  |
|  | 7   |                      | 2033 Gateway Place, 5th Floor<br>San Jose, CA 95110   |
|  | 8   |                      | 2033 Gateway Place, 5th Floor<br>San Jose, CA 95110<br>Telephone: (408) 279-2288<br>Facsimile: (408) 279-2299 |
|  | 9   |                      | Attorney for Plaintiff  |
| LLP  | 10  |                      | LUIS ALANDY   |
| 7.   | 11  |                      |   |
| & LAVAN<br>East<br>0067-3086                   | 12  |                      |   |
|  | 13  |                      |   |
| STROOCK<br>9 Century Parl<br>les, California 9 | 14  |                      |   |
| & S'<br>2029 o<br>ngeles                       | 15  |                      |   |
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STIPULATION TO FURTHER CONTINUE DEADLINE TO RESPOND TO COMPLAINT Case No. 5:16-cv-02152-EJD

## 2029 Century Park East Los Angeles, California 90067-3086

## **ECF Signature Certification**

Pursuant to Civil L.R. 5-1(i)(3), I hereby certify that the content of this document is acceptable to Elliot Gale, counsel for Plaintiff, and that I have obtained Mr. Gale's authorization to affix his electronic signature to this document.

Dated: June 14, 2016

/s/ Julieta Stepanyan

Julieta Stepanyan

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# Los Angeles, California 90067-3086 2029 Century Park East

| <b>CERTIFICAT</b> | E OF | SERV | /ICE |
|-------------------|------|------|------|
|-------------------|------|------|------|

I hereby certify that, on June 14, 2016, copies of the foregoing **STIPULATION TO** FURTHER CONTINUE DEADLINE FOR DEFENDANT CHASE BANK USA, N.A. TO RESPOND TO COMPLAINT FROM JUNE 14, 2016, TO JUNE 28, 2016, PURSUANT TO **LOCAL RULE 6-1** were filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

| By: | /s/ Julieta Stepanyan |  |
|-----|-----------------------|--|
|     | Julieta Stepanyan     |  |